Mr. Craig Chalfant, Senior Planner  
Development Services Department  
City of Long Beach  
333 West Ocean Boulevard, 5th Floor  
Long Beach, CA 90802

Dear Mr. Chalfant:

Response to NOP for the 2nd and PCH Project

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on November 17, 2016. The proposed project is located within the jurisdictional boundary of District No. 3. We offer the following comments:

18. UTILITIES AND SERVICE SYSTEMS

1. Item a., page 46, top of page – The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson, which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 254.1 mgd.

2. Item b., page 47, last paragraph – Wastewater generated during Project operations would be collected and discharged to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts’ Marina Trunk Sewer Section 4, located in private right of way northwest of the intersection of Marina Drive and 2nd Street. The Districts’ 9.48-inch diameter lined trunk sewer has a capacity of 1 mgd and conveyed a peak flow of 0.7 mgd when last measured in 2012. Please refer to item no. 1 for JWPCP information and revise accordingly.

3. Item b., page 47, last paragraph – Based on the Districts’ average wastewater generation factors, the expected increase in average wastewater flow from the proposed project, described in the document as a 245,000-square-foot shopping center, is 48,125 gallons per day, after the Seaport Marina Hotel on the project site is demolished. For a copy of the Districts’ average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

4. Item b., page 48, top of page – The information states the existing wastewater infrastructure would have adequate capacity to accommodate the Project’s net increase in wastewater flows. It should be noted that availability of sewer capacity depends upon project size and timing of connection to the sewerage system. Because there are other proposed developments in the area,
the availability of trunk sewer capacity should be verified as the project advances. Please submit a copy of the project’s build-out schedule to the undersigned to ensure the project is considered when planning future sewerage system relief and replacement projects.

5. All other information concerning Districts’ facilities and sewerage service contained in the document is current.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar
cc: M. Sullivan
    M. Tatalovich
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

**Potential Significant Impact.** Approved by Governor Jerry Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require excavation activities which may affect previously undisturbed soils. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations. Further analysis of this topic will be provided in the EIR.

18. UTILITIES AND SERVICE SYSTEMS. Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

**Less Than Significant Impact.** The City of Long Beach Water Department provides wastewater collection and treatment services for the Project Site. Wastewater generated
during Project operation would be collected and discharged into existing sewer mains and conveyed to the Joint Water Pollution Control Plant (JWPCP) in the City of Carson or the Long Beach Water Reclamation Plant (LBWRP). The Joint Water Pollution Control Plant provides primary and secondary treatment for approximately 200 million gallons of wastewater per day (mgd) and has a total permitted capacity of 400 mgd.\(^2\) The Long Beach Water Reclamation Plant provides primary, secondary, and tertiary treatment for 25 million gallons of wastewater per day.\(^2\) The wastewater treatment facilities serving the City have a combined treatment capacity of 425 mgd. Based on annual performance data reported by the Sanitation Districts of Los Angeles County for the year 2015, the JWPCP processes an average flow of approximately 250 mgd. As such, the JWPCP has an available treatment capacity of 167 mgd.

Incoming wastewater to the JWPCP and the LBWRP initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where solids are allowed to either settle to the bottom of tanks or float on the surface. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge. After secondary treatment is complete at the JWPCP, the water is disinfected and dispersed to the Pacific Ocean through networks of outfalls that extend two miles off the Palos Verdes Peninsula to a depth of 200 feet. After secondary treatment is complete at the LBWRP, the water is filtered to remove any remaining suspended materials (tertiary treatment), and the reclaimed water is reused. Any discharge of effluent from the JWPCP into the Pacific Ocean is regulated by the JWPCP NPDES Permit issued under the Clean Water Act and is required to meet the requirements set forth by Regional Water Quality Control Board (RWQCB). Accordingly, the JWPCP’s effluent to the Pacific Ocean is continually monitored to ensure that it meets or exceeds prescribed standards.

The wastewater generated by the Project would be typical of commercial, retail, and restaurant uses. No industrial discharge into the wastewater system would occur. Additionally, restaurant kitchens would be equipped with grease traps as required. As the JWPCP is in


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compliance with the State’s wastewater treatment requirements, the Project would not exceed the wastewater treatment requirements of RWQCB. Therefore, impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this issue is required.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

**Potentially Significant Impact.** Water and wastewater systems consist of two components: the source of the water supply or place of sewage treatment and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. With respect to water, the location, condition, and capacity of water conveyance lines will be evaluated in an EIR to determine whether adequate capacity is available to accommodate the required fire flows and domestic water demand generated by the Project.

With respect to wastewater, as described in response to Question 18.a, above, wastewater generated during Project operation would be collected and discharged into existing sewer mains and conveyed to the JWPCP or the LBWRP, which have a combined treatment capacity of 425 mgd. Wastewater from the Project currently flows through an existing 12-inch diameter sewer main located in 2nd Street. Based on the Sewer Study prepared by Incledon Consulting Group and included as Appendix IS-2 of this Initial Study, and confirmed by the peer review of that study prepared by Psomas and included as Appendix IS-3, the 12-inch sewer main is estimated to convey an average of 0.70 cubic feet per second (cfs) of wastewater with a maximum flow depth of 7.08 inches and is within the maximum acceptable flow depth of 9.0 inches (75 percent of the total pipe depth) for a 12-inch diameter sewer main. Based on the proposed uses, the Project is estimated to generate approximately 92,500 gallons per day (gpd) of wastewater, which equates to a peak flow of 0.243 cubic feet per second (cfs). When accounting for the existing on-site uses, which generate approximately 28,092 gpd

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(peak flow of 0.075 cfs) of wastewater and which would be removed as part of the Project, the Project would result in a net increase in wastewater generation of approximately 64,408 gpd. This equates to a peak flow of 0.108 cfs. When the Project's flows are added to the existing 12-inch sewer main, total flows in the sewer main would be 0.068 cfs and the sewer main would continue to operate below the standard acceptable operating limit capacity of 75 percent. Therefore, the existing wastewater infrastructure would have adequate capacity to accommodate the Project's net increase in wastewater flows. As such, wastewater treatment demands generated by the Project are not expected to result in the need to construct new wastewater lines to serve the Project.

As discussed in response to Question 18.a, above, wastewater from the Project Site is conveyed via municipal sewage infrastructure to the JWPCP or LBWRP. The JWPCP has an available capacity of approximately 467 mgd. The Project's net increase in wastewater generation of approximately 64,408 gpd would represent approximately 0.04 percent of the available capacity at the JWPCP. Therefore, given the amount of wastewater expected to be generated by the Project, adequate wastewater treatment capacity would be available to serve the Project Site. As such, the Project would have a less than significant impact with respect to wastewater treatment and infrastructure. No mitigation measures would be required, and no further analysis of this topic is required.

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

**Potentially Significant Impact.** Please refer to responses to Questions 9.a and 9.d, above. As discussed therein, with implementation of the Project, drainage patterns within the Project Site may be altered. Therefore, the potential for the Project to contribute runoff which would exceed the capacity of existing drainage systems and thereby require the construction of new stormwater drainage facilities will be analyzed further in an EIR.

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d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

**Potentially Significant Impact.** The Long Beach Water Department supplies water to the Project Site. The Project could increase the demand for water provided by Long Beach Water Department. Given the complexity and evolving nature of water supply in Southern California, further analysis of this issue in an EIR will be provided.

e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?

**Less Than Significant Impact.** Please refer to response to Question 18.b, above. As discussed therein, based on the amount of wastewater expected to be generated by the Project, existing wastewater treatment capacity, and future wastewater treatment capacity, adequate wastewater treatment capacity would be available to serve the Project Site. As such, the Project would have a less than significant impact with respect to wastewater treatment and infrastructure. No mitigation measures would be required, and no further analysis of this topic is required.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?

**Less Than Significant Impact.** The Automated Refuse Collection Division within the Department of Public Works Environmental Services Bureau provides a comprehensive range of refuse disposal and waste management planning services to residents and businesses in the City. Non-hazardous municipal solid waste is disposed of in Class III landfills, while construction waste, yard trimmings, and earth-like waste are disposed of in unclassified (inert) landfills. In 2015, the most recent year for which data are available, 13 Class III landfills and one unclassified landfill with solid waste facility permits accepted waste from the City of Long